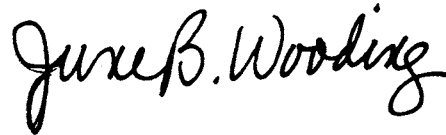


AFFIDAVIT OF JUNE WOODING

1. My name is June Wooding.
2. I am employed by Massachusetts Electric Company ("Mass. Electric") as an Account Manager. In that position, I provide business and customer services to Mass. Electric's commercial and industrial customers, including municipalities.
3. I have been the account manager for Foxborough for almost four years. I am familiar with Foxborough's streetlight accounts.
4. I estimate that Foxborough owns 736 lights that Mass. Electric provides maintenance service to pursuant to our S-2 rate for customer owned streetlights.
5. I estimate that Mass. Electric owns 338 lights in Foxborough , which Foxborough leases pursuant to Mass. Electric's S-1 rate for company owned streetlights.
6. Mass. Electric currently provides maintenance to all of these streetlights pursuant to the terms of the S-1 and S-2 tariffs. We have provided excellent service to Foxborough for streetlight maintenance. We have not received any complaints regarding our streetlighting service from Foxborough, and were surprised by the statement in the affidavit of Foxborough Town Administrator Andrew Gala that Foxborough believes we have neglected some streetlights. Our average response time for handling a problem is less than one day, and we have not decreased the level or amount of service that we provide in 2002, despite Foxborough's hiring of Republic Electric to provide streetlight maintenance beginning on January 1, 2002. For example, in the first four months of 2000 we repaired 33 streetlights, in the first four months of 2001 we repaired 44 streetlights, and in the first four months of 2002 we have repaired 38 streetlights.
7. In the beginning of November, I received a letter from Foxborough Town Administrator Andrew Gala dated November 1, 2001 which stated that Foxborough was considering buying the Mass. Electric owned lights in Foxborough and asking for the depreciated book value purchase price of these lights. This letter is attached to Foxborough's petition at Appendix A-9. In response, Mass. Electric began a thorough inventory of Foxborough's streetlights by taking a computer generated inventory of all lights in the town and physically driving every street in the community to verify the light type, size, and location of the lights.
8. I informed Andrew Gala orally and in writing that Mass. Electric was working to develop the purchase price during the winter of 2001-2002. In writing, I explained this to him in a letter dated March 1, 2002 and attached to Foxborough's petition at Appendix A-16.

9. Once the inventory was complete, Mass. Electric calculated the purchase price of the lights in Foxborough owned by the company according to the Department's methodology in D.T.E.01-25.
10. In the beginning of April 2002, I spoke to Andrew Gala on the phone. I told him that Mass. Electric had completed the streetlight inventory and had calculated the purchase price for the streetlights. I requested that we meet so that I could present all of the information to Foxborough. I suggested that Board of Selectmen come to the meeting, so that I could present the information to everyone at once. I did not set any preconditions to meeting, however. By requesting this meeting, I had hoped to respond to Foxborough's requests and needs in an amicable way.
11. In response, Mr. Gala told me that he would call me back to arrange a meeting after he spoke with the Chairman of the Board of Selectmen. I waited for his return phone call, anticipating that I would provide the purchase price information at our meeting. I never heard from him, however. Instead, Mass. Electric received a copy of Foxborough's petition to the Department.
12. Mass. Electric stands ready, willing, and able to provide the purchase price and back-up documentation to Foxborough.

Signed under the pains and penalties of perjury,



June Wooding

Dated: May 8, 2002